

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 22-20422-CR-MIDDLEBROOKS(s)**

**UNITED STATES OF AMERICA**

**v.**

**ISMAEL SOTO AROCHO,**

**Defendant.**

\_\_\_\_\_ /

**FACTUAL PROFFER**

The United States of America and Ismael Soto Arocho (the “Defendant”) agree that, had this case gone to trial, the United States would have proven the following facts, among others, beyond a reasonable doubt:

On or about August 24, 2022, the Defendant did knowingly and intentionally attempt to possess with intent to distribute approximately 9.17 kilograms of cocaine, a Schedule II controlled substance.

On August 17, 2022, the Defendant learned that approximately 9.17 kilograms of cocaine would be arriving in the United States via a shipping vessel from the Dominican Republic. The cocaine was to be attached to the underside of the vessel to avoid detection by law enforcement.

The shipping vessel carrying approximately 9.17 kilograms of cocaine arrived in the Southern District of Florida and docked on the Miami River on the night of August 23, 2022. On the morning of August 24, 2022, the Defendant assisted in the retrieval of what he believed to be the cocaine from the underside of the vessel.

The Defendant then drove his white Ford van to a nearby hotel. Once inside the hotel, he

realized the cocaine was in fact sham narcotics containing tracking devices placed the previous day by law enforcement. The true cocaine had been intercepted by law enforcement officers after the vessel's arrival in the United States. The Defendant attempted to dispose of the sham narcotics by throwing them into a nearby lake.

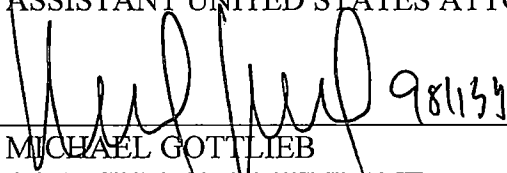
The facts described above are not intended to be a complete recitation of the facts of this case and are merely intended to form a basis for the Defendant's knowing, willful, and intentional plea of guilty

JUAN ANTONIO GONZALEZ  
UNITED STATES ATTORNEY

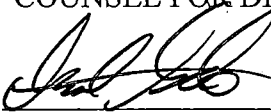
Date: 1/6/23

By:   
JULIA M. MALONEY  
ASSISTANT UNITED STATES ATTORNEY

Date: 1/6/23

By:  981133  
MICHAEL GOTTLIEB  
COUNSEL FOR DEFENDANT

Date: 1/6/23

By:   
ISMAEL SOTO AROCHO  
DEFENDANT